

EXHIBIT 18

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Attorneys for The SCO Group, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

THE SCO GROUP, INC.,

Plaintiff/Counterclaim-Defendant,

v.

INTERNATIONAL BUSINESS
MACHINES CORPORATION,

Defendant/Counterclaim-Plaintiff.

**PLAINTIFF'S SEVENTH REQUEST
FOR PRODUCTION OF
DOCUMENTS**

Case No. 2:03CV0294DAK
Honorable Dale A. Kimball
Magistrate Judge Brooke C. Wells

Defendant is requested to produce the documents and things in its possession, custody, or control pursuant to these document requests and in accordance with the following definitions and instructions.

All documents and things responsive to these document requests must be served on the undersigned attorneys for The SCO Group, Inc. at the offices of Boies, Schiller & Flexner LLP, 333 Main Street, Armonk, New York 10504, within 30 days of service of these document requests.

DEFINITIONS AND INSTRUCTIONS

Plaintiff hereby incorporates by reference all instructions, definitions, and rules contained in the Federal Rules of Civil Procedure and further incorporates all the definitions and instructions contained in Plaintiff's previous sets of interrogatories and requests for production of documents, as if fully set forth herein. In addition, for purposes of these requests for production, the following supplemental definitions apply:

1. The phrase "Linux Summit" shall include the Linux Kernel Summit, the Linux Kernel Developers Summit, and any (other) Linux summit or conference.
2. The term "USERblue Forum" shall include the USERblue.org website; any IBM-sponsored website or internet page linked or related to the USERblue.org website; and any person or entity to which the terms "USERblue" or "USERblue Forum" refer, including agents, representatives, and affiliates thereof.
3. The term "Groklaw" shall include the Groklaw.net website; any other website or internet page that is linked or related to that website and that covers or reports on this litigation; and

any person or entity that has administered or maintained the Groklaw website, including agents, representatives, and affiliates thereof.

4. The term "Linux 2.7 kernel" shall include any Linux kernel that functions or is intended to function as the successor to the Linux 2.6 kernel.
5. The term "project" shall include without limitation "effort," "initiative," or "group."
6. The word "developed" shall include without limitation the meaning conveyed by the words "improved," "increased," "modified," "enhanced," and "further developed."
7. "Novell" shall refer collectively to Novell, Inc. and SuSE (both before and after its acquisition by Novell).

Document Requests Nos. 300-67 include requests for information that SCO believes the Court has already ordered IBM to produce in response to SCO's previous interrogatories and document requests. In order to protect SCO's right to receive all information related to IBM's development work for Linux, these document requests include requests for that same information in extremely specific language intended to foreclose any further attempts by IBM to limit its discovery obligations. For purposes of these requests, the following definitions also apply:

8. The term "development work" shall include, but not be limited to, (1) all versions or iterations of source code, whether or not constituting or included in an IBM Linux patch or IBM Linux submission; (2) all intermediate or development-stage programming code generated in the Linux development process; (3) all intermediate or development-stage programmer's notes and comments; (4) all source reference matrices, decoder utilities and matrices, or tools used in the development or transfer of source code; (5) all information

contained in any revision control database; and (6) all efforts to improve, increase, modify, enhance, or further develop source code.

9. The term “contribution” or “contributions” shall include, but not be limited to, the transfer or disclosure of (1) literal expressions of source code, (2) non-literal expressions of the sequence, structure, or organization of source code, (3) derivatives, derivative works or modifications of source code, and (4) methods or concepts embodied or implemented in source code. The term shall also include all such transfers or disclosures of technology, whether made directly or through any third-party person or entity or through any project or platform which IBM has sponsored in any manner or in which IBM has participated. By way of example, but not limitation, indirect transfers of technology would include those that IBM made in connection with the Open Source Development Lab, K-42 Linux Project, Leeds/Linux Project, or SawMill Project.
10. The phrase “contributions from UNIX, AIX, or Dynix” shall include, but not be limited to, “all contributions of, based on, or derived from UNIX System V, AIX, or Dynix/ptx source code.”

REQUESTED DOCUMENTS

Linux Summit

272. All documents concerning IBM’s participation or involvement in any Linux Summit, including but not limited to documents concerning any presentation, speech, or talk given by IBM, and documents concerning any workshop, training, discussion, or exhibit conducted or sponsored by IBM.

- 273. All documents concerning or prepared in connection with the planning or organization of any Linux Summit by any IBM employee, agent, or contractor.
- 274. All documents concerning IBM's decisions, measures, actions, or activities resulting from, responding to, or following up any Linux Summit.
- 275. All documents evaluating, reviewing, summarizing, reporting on, drawing conclusions from, or making recommendations or decisions based on any Linux Summit.
- 276. All documents not included in Document Requests Nos. 272-75 above concerning any Linux Summit.

USERblue Forum

- 277. All documents concerning any presentation, speech, or remarks delivered in connection with the USERblue Forum.
- 278. All documents concerning any workshop, training, discussion, "webcast," or "webinar" conducted in connection with the USERblue Forum.
- 279. All documents concerning any IBM demonstration or exhibit at a USERblue Forum session or event.
- 280. All documents posted or appearing on the USERblue.org website.
- 281. All other documents concerning content for the USERblue.org website, including but not limited to documents concerning any decision to exclude or remove from that website any document subject to Document Requests Nos. 277-80 above.
- 282. All documents not included in Document Requests Nos. 277-81 above concerning the USERblue Forum.

Groklaw

- 283. All documents concerning the financing, funding, sponsorship, or promotion of Groklaw.
- 284. All documents concerning content for the Groklaw website, including without limitation notes, drafts, and reviews corresponding to writings posted or appearing on that website.
- 285. All documents not included in Document Requests Nos. 283-84 above concerning IBM's direct or indirect support for Groklaw, including but not limited to documents concerning IBM's provision of personnel, services, labor, servers, equipment, office space, or funds to implement, maintain, or administer Groklaw, and including support provided through any intermediary such as GoDaddy.com or Ibiblio.org.
- 286. All documents concerning communications with Pamela Jones or with any person or entity that has maintained or contributed to Groklaw.
- 287. All documents concerning any agreements, negotiations, arrangements, or dealings between IBM and Pamela Jones or any person or entity that has maintained or contributed to Groklaw.
- 288. All documents concerning Groklaw or Pamela Jones not included in Document Requests Nos. 283-87 above.

Patents

- 289. All UNIX-related patents that IBM has donated to Linux or open source.
- 290. All UNIX-related patents that IBM intends or has pledged to donate to Linux or open source.

291. All documents reflecting the patent number or other identifying information corresponding to any UNIX-related patent that IBM has donated, or intends to donate, to Linux or open source.
292. All documents not included in Document Requests Nos. 289-91 above concerning any UNIX-related patent that IBM has donated, or intends or has pledged to donate, to Linux or open source, including but not limited to documents concerning the patent history filed by IBM with respect to any such patent.

Product Releases

293. All documents, including without limitation letters, memoranda, and contracts, in which IBM has defined or adopted a definition of the term "General Availability Release" ("GA release").
294. All documents, including without limitation letters, memoranda, and contracts, in which IBM has defined or adopted a definition of the term "Product Request for Pricing Quote Release" ("PRPQ release").
295. All documents, including manuals, concerning IBM's current or former requirements, guidelines, instructions, or procedures for making a GA release of a product such as an operating system, including but not limited to documents concerning the internal review, testing, support, approvals, and level of product development required or recommended for a GA release.
296. All documents, including manuals, concerning IBM's current or former requirements, guidelines, instructions, or procedures for making a PRPQ release of a product such as an operating system, including but not limited to documents concerning the internal review,

testing, support, approvals, and level of product development required or recommended for a PRPQ release.

- 297. All documents, including manuals, concerning IBM's current or former requirements, guidelines, instructions, or procedures for making a release (other than a GA or PRPQ release) of a product such as an operating system, including but not limited to documents concerning the internal review, testing, support, approvals, and level of product development required or recommended for such a release.
- 298. All documents not included in Document Requests Nos. 293-97 above concerning any category of product release (including GA or PRPQ) made by IBM of its products.
- 299. All documents concerning IBM's policies, procedures, rules, guidelines, codes of conduct, requirements, or expectations with respect to the proprietary and intellectual-property rights of third parties in the development of products by IBM.

Linux 2.7 Kernel

- 300. All documents concerning IBM's contributions to the Linux 2.7 kernel, including but not limited to any architectural design, layout, functionality, source code, and source-code patches contributed by IBM to the Linux 2.7 kernel.
- 301. All documents concerning development work associated with IBM's contributions to the Linux 2.7 kernel.
- 302. *All documents concerning the development of the Linux 2.7 kernel not included in Document Requests Nos. 300 and 301 above.*
- 303. All documents concerning the Linux 2.7 kernel not included in Document Requests Nos. 300-302 above.

Linux Development Trees

- 304. All development trees for Linux that are or were maintained, used, or accessed by IBM, including but not limited to the “mjb” and the “mm” development trees.
- 305. All documents concerning IBM’s contributions to any development tree for Linux.
- 306. All documents not included in Document Requests Nos. 303-05 above concerning development work associated with IBM’s contributions to any development tree for Linux.
- 307. All documents not included in Document Requests Nos. 303-06 above concerning any development tree for Linux that has been maintained, used, or accessed by IBM.

Open Source Development Lab (OSDL)

- 308. All documents concerning IBM’s participation or involvement in or contributions to the OSDL. Such documents shall include but not be limited to source code, source-code patches, programmer’s notes or comments, design documents, and white papers.
- 309. All documents concerning contributions to Linux or open source that were originated, developed, or made by the OSDL. Such documents shall include but not be limited to source code, source-code patches, programmer’s notes or comments, design documents, and white papers.
- 310. All documents concerning development work associated with IBM’s contributions to the OSDL.
- 311. All documents concerning development work associated with contributions to Linux or open source that were originated, developed, or made by the OSDL.
- 312. All documents concerning development work done by the OSDL in connection with IBM’s contributions to Linux or open source.

- 313. All documents concerning communications between IBM and the OSDL regarding contributions to Linux or development work for Linux.
- 314. All documents concerning communications with any person or entity associated with the OSDL regarding the development work conducted by the OSDL.
- 315. All other documents concerning communications regarding the OSDL's contributions to Linux or development work for Linux.
- 316. All documents concerning agreements, negotiations, arrangements, or dealings between IBM and the OSDL.
- 317. All documents concerning Linux-related agreements, negotiations, arrangements, or dealings between IBM and/or OSDL, on the one hand, and any one or more of the following parties, on the other: Linus Torvalds, Andrew Morton, Richard Stallman, Alan Cox, Eben Moglen, Red Hat, SuSE, or any person or entity that has distributed Linux or made contributions to Linux or open source.
- 318. All documents not included in Document Requests Nos. 308-317 above concerning agreements associated with the OSDL.
- 319. All documents concerning policies, procedures, guidelines, or instructions for the OSDL's compliance with laws protecting copyrights, patents, trade secrets, or confidential information.
- 320. All documents concerning any evaluation, review, or audit of the OSDL's compliance with the policies, procedures, guidelines, or instructions in Document Request No. 319 above.
- 321. All documents concerning any evaluation, review, or audit of the OSDL's compliance with laws protecting copyrights, patents, trade secrets, or confidential information.

322. All documents concerning the OSDL's document-retention policy.

323. All documents concerning the OSDL not included in Document Requests Nos. 308-22 above.

Linux Projects

324. All documents not included in Document Requests Nos. 308-323 above concerning IBM's contributions to

- the Carrier-Grade Linux project,
- the Data Center Linux project,
- the Linux 2.6 Stabilization project,
- the Linux Highmem (large memory) Test (or Testing) project,
- the I/O Subsystem Enhancement project,
- the IA-64 Linux Development project,
- the Linux Diagnostics Tool project,
- the Linux Test project,
- Dynix/ptx SMP and NUMA test suite ports to Linux,
- Dynix/ptx SMP and NUMA lock ports to Linux, or
- any (other) project sponsored by the Open Source Technology Group (formerly known as the Open Source Development Network).

Such documents shall include but not be limited to source code, source-code patches, programmer's notes or comments, design documents, and white papers.

325. All contributions to Linux or open source that were originated, developed, or made by any project listed in Document Request No. 324 above.

- 326. All documents concerning development work associated with IBM's contributions to any project listed in Document Request No. 324 above.
- 327. All documents concerning development work associated with contributions to Linux or open source that were originated, developed, or made by any project listed in Document Request No. 324 above.
- 328. All documents concerning development work done by any project listed in Document Request No. 324 above in connection with IBM's contributions to Linux or open source.
- 329. All documents concerning communications between IBM and any project listed in Document Request No. 324 above regarding contributions to Linux or development work for Linux.
- 330. All documents concerning communications with any person or entity associated with any project listed in Document Request No. 324 above, regarding the work conducted by any such project.
- 331. All documents not included in Document Request Nos. 329-30 above concerning communications regarding the work of any project listed in Document Request No. 324 above.
- 332. All documents concerning policies, procedures, guidelines, or instructions for the compliance with laws protecting copyrights, patents, trade secrets, or confidential information by any project listed in Document Request No. 324 above.
- 333. All documents concerning any evaluation, review, or audit of the compliance with the policies, procedures, guidelines, or instructions in Document Request No. 332 above by any project listed in Document Request No. 324 above.

334. All documents concerning any evaluation, review, or audit of the compliance with laws protecting copyrights, patents, trade secrets, or confidential information by any project listed in Document Request No. 324 above.

335. All documents not included in Document Requests Nos. 324-34 above concerning any project listed in Document Request No. 324 above.

IBM-Research Projects

336. All documents concerning contributions to Linux originated, developed, or made by

- the K42 project,
- the SawMill project,
- the Leeds/Linux project,
- the Adaptive Fast Path Architecture (AFPA) project,
- the flexible UNIX servers project,
- the Enterprise Linux project,
- the embedded Linux project,
- or any IBM-Research project that has done development work for Linux or open source or made contributions to Linux or open source.

Such documents shall include but not be limited to source code, source-code patches, programmer's notes or comments, design documents, and white papers.

337. All documents concerning development work associated with contributions to Linux or open source that were originated, developed, or made by any project listed in Document Request No. 336 above.

- 338. All documents concerning development work done by any project listed in Document Request No. 336 above in connection with IBM's contributions to Linux or open source.
- 339. All documents concerning communications regarding any project listed in Document Request No. 336 above.
- 340. All documents concerning agreements, negotiations, arrangements, or dealings associated with any project listed in Document Request No. 336 above.
- 341. All documents concerning policies, procedures, guidelines, or instructions for compliance with laws protecting copyrights, patents, trade secrets, or confidential information by a project listed in Document Request No. 336 above.
- 342. All documents concerning any evaluation, review, or audit of the compliance with the policies, procedures, guidelines, or instructions in Document Request No. 341 above by any project listed in Document Request No. 336 above.
- 343. All documents concerning any evaluation, review, or audit of the compliance with laws protecting copyrights, patents, trade secrets, or confidential information by a project listed in Document Request No. 336 above.
- 344. All documents not included in Document Requests Nos. 336-343 above concerning any project listed in Document Request No. 336 above.

Wipro Limited

- 345. All documents concerning IBM's contributions from UNIX, AIX, or Dynix to Wipro Limited (Wipro). Such documents shall include but not be limited to source code, source-code patches, programmer's notes or comments, design documents, and white papers.

- 346. All documents concerning contributions to Linux or open source that were originated, developed, or made by Wipro. Such documents shall include but not be limited to source code, source-code patches, programmer's notes or comments, design documents, and white papers.
- 347. All documents concerning development work associated with IBM's contributions from UNIX, AIX, or Dynix to Wipro.
- 348. All documents concerning development work associated with Wipro's contributions to Linux or open source.
- 349. All documents concerning development work done by Wipro in connection with IBM's contributions to Linux or open source.
- 350. All documents concerning communications between IBM and Wipro regarding UNIX, AIX, Dynix, or Linux.
- 351. All communications concerning development work done by Wipro involving UNIX, AIX, Dynix, or Linux.
- 352. All documents concerning agreements, negotiations, arrangements, or dealings between IBM and Wipro regarding UNIX, AIX, Dynix, or Linux.
- 353. All documents concerning Linux-related agreements, negotiations, arrangements, or dealings between IBM and/or Wipro, on the one hand, and any one or more of the following parties, on the other: Linus Torvalds, Andrew Morton, Richard Stallman, Alan Cox, Eben Moglen, RedHat, SuSE, or any person or entity that has distributed Linux or made contributions to Linux or open source.

354. All documents concerning any Task Order involving UNIX, AIX, Dynix, or Linux under any Technical Service Agreement and/or Statement of Work (SOW) between IBM and Wipro.
355. All documents not included in Document Requests Nos. 345-54 above concerning development work done by Wipro involving UNIX, AIX, Dynix, or Linux.

Other Projects, Persons, and Entities

356. All documents not included in the Document Requests above concerning IBM's contributions from UNIX, AIX, or Dynix to any project, person, or entity (whether or not and however affiliated with IBM) that has done development work for Linux or open source or made contributions to Linux or open source.
357. All documents not included in the Document Requests above concerning contributions from UNIX, AIX, or Dynix to Linux or open source that were originated, developed, or made by any project, person, or entity (whether or not and however affiliated with IBM) that has done development work for Linux or open source or made contributions to Linux or open source.
358. All documents not included in the Document Requests above concerning development work associated with IBM's contributions from UNIX, AIX, or Dynix to any project, person, or entity (whether or not and however affiliated with IBM) that has done *development work for Linux or open source or made contributions to Linux or open source.*
359. All documents not included in the Document Requests above concerning development work associated with contributions from UNIX, AIX, or Dynix to Linux or open source

that were originated, developed, or made by any project, person, or entity (whether or not and however affiliated with IBM) that has done development work for Linux or open source or made contributions to Linux or open source.

360. All documents not included in the Document Requests above concerning development work done by any project, person, or entity (whether or not and however affiliated with IBM) in connection with IBM's contributions to Linux or open source.

361. All documents not included in the Document Requests above concerning any Linux-related agreements, negotiations, arrangements, or dealings between IBM and/or any project, person, or entity (whether or not and however affiliated with IBM) that has done development work for Linux or open source or made contributions to Linux or open source, on the one hand, and any one or more of the following parties, on the other: Linus Torvalds, Andrew Morton, Richard Stallman, Alan Cox, Eben Moglen, Red Hat, SuSE, or any person or entity that has distributed Linux or made contributions to Linux or open source.

Further Requests

362. All documents not included in the Document Requests above concerning development work associated with IBM's contributions to Linux.

363. All documents not included in the Document Requests above concerning contributions to Linux that were requested, approved, reviewed, evaluated, modified, or developed by IBM.

364. All documents not included in the Document Requests above concerning development work associated with the contributions to Linux described in Document Request No. 363 above.

365. All documents not included in the Document Requests above concerning any platform for staging *IBM's contributions to Linux*.

366. All documents not included in the Document Requests above concerning policies, procedures, guidelines, or instructions for IBM's compliance with laws protecting copyrights, patents, trade secrets, and confidential information.

367. All documents concerning actual or potential copyright, patent, or trade-secret violations in the development of the Linux kernel.

IBM, Novell, SuSE, and this Litigation

368. All documents concerning communications between IBM and Novell regarding this litigation or any lawsuit related to this litigation. Such documents shall include but not be limited to e-mail, letters, memoranda, agendas, minutes, transcripts, calendar entries, and notes.

369. All documents concerning any agreements, negotiations, arrangements, or dealings between IBM and Novell in connection with this litigation or any lawsuit related to this litigation.

370. All documents concerning this litigation or any lawsuit related to this litigation sent to, delivered to, presented to, or shared with Novell by IBM or any person or entity acting on behalf of IBM.

371. All documents concerning this litigation or any lawsuit related to this litigation sent to, delivered to, presented to, or shared with IBM by Novell or any person or entity acting on behalf of Novell.

Other

372. All documents concerning IBM's plans, efforts or attempts to market, promote, or advertise
- (a) hardware products or software products usable with Linux-based operating systems, AIX operating systems, or Dynix operating systems; (b) middleware software usable in a Linux environment; or (c) services (including installation, development, maintenance, consulting, or migration services) associated with Linux-based systems or software products, AIX systems or software products, or Dynix systems or software products.
373. All documents concerning the drafting, revision, and editing of the System V Software Agreements between AT&T and IBM, and AT&T and Sequent. Such documents shall include without limitation all drafts, revisions, and mark-ups.

DATED this 12th day of August, 2005.

Respectfully submitted,

HATCH, JAMES & DODGE, P.C.

Brent O. Hatch

Mark F. James

BOIES, SCHILLER & FLEXNER LLP

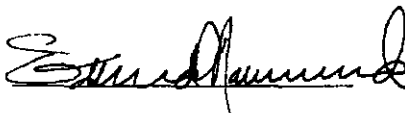
Robert Silver (admitted pro hac vice)

Stuart H. Singer (admitted pro hac vice)

Stephen N. Zack (admitted pro hac vice)

Edward Normand (admitted pro hac vice)

By:

A handwritten signature in black ink, appearing to read "Edward Normand", written over a horizontal line.

Attorneys for The SCO Group, Inc.

CERTIFICATE OF SERVICE

Plaintiff, The SCO Group, Inc., hereby certifies that a true and correct copy of the foregoing Plaintiff's Seventh Request for Production of Documents was served by mail on Defendant International Business Machines Corporation on the 12th day of August, 2005, by U.S. Mail to:

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